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Program Letter
Bureau of Storage Tank Regulation
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Characteristics of Regulated Flammable or Combustible Liquids

When is flammable liquid not a *regulated* flammable liquid? That question has been presented to the Department to address products which technically exhibit a flashpoint, but in reality will not sustain burning or may actually extinguish a fire. Glass cleaners and polymer waxes are two examples of such products.

Regulatory codes and national standards use the characteristic flashpoint as the basis for classification because flashpoint has a direct relationship to volatility. Flashpoint is determined by laboratory testing using open-cup and closed-cup test methodologies in a confined space. While the traditional testing determines the flashpoint characteristics useful in classifying flammable and combustible liquids, it may not represent the true response of a substance in a non laboratory – unconfined situation. NFPA 30–A-1-7.2 recognizes ASTM test methods that identify products that do not sustain combustion for a specified time at a specified temperature and are therefore considered to be non combustible.

Products evaluated by the following standards and successfully meeting the non combustible test criteria of the respective tests will not be subjected to the ILHR 10 regulations as flammable or combustible liquids:

- ASTM D 4207, Standard Test Method For Sustained Burning of Low Viscosity Liquid Mixtures by the Wick Test, and
- ASTM D4206, Standard Test Method For Sustained Burning of Liquid Mixtures by the Setaflash Tester (Open Cup).